



September 29, 2005

BY ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92*

Dear Ms. Dortch:

On September 28, 2005, Martin W. Clift, Jr., VP – Regulatory, John J. Haraburda, Director – Revenue Assurance, and the undersigned, all of Cavalier Telephone, LLC (“Cavalier”), met with: Steve Morris, Randy Clarke, Margaret Daily, Jodie May, Jonathan Reel, Jeremy Miller, Tamara Preiss, Chris Barnekov, and Jay Atkinson, all of the Wireline Competition Bureau’s Pricing Division concerning issues in the proceeding cited above. Cavalier presented the views set forth in the attached documents, which were provided in the meeting.

Cavalier emphasized that its recorded switch data shows information missing from traffic passed to Cavalier originating from Verizon and transiting Verizon’s tandem switch. Cavalier also emphasized that Verizon’s meet-point billing records, used to identify interexchange and transit traffic, were incomplete and unverifiable. Cavalier thus requested that the Commission establish rules requiring local exchange carriers to pass information with each call sufficient to identify the (originating) carrier to be charged and the jurisdiction of each call. Such a requirement would allow carriers to classify call records from their own switch information, and eliminate the need to rely upon records created by other carriers.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephen T. Perkins".

Stephen T. Perkins  
*General Counsel*

cc: Steve Morris  
Randy Clarke  
Margaret Dailey  
Jodie May  
Jonathan Reel  
Jeremy Miller  
Tamara Preiss  
Chris Barnekov  
Jay Atkinson

# Phantom Traffic

## Verizon/Cavalier Dispute

Verizon Unpaid CABS Bills - \$6 m

PUC Complaints – VA, MD, PA

Monthly Impact - \$625k



# Phantom Traffic

- No Carrier Identifier - CIC/OCN Code
- No Jurisdiction Identifier
  - Missing Orig/Term NPA/NXXX
  - Invalid NPA/NXXX
  - Fraudulent NPA/NXXX



# VA FCCC '03 Arbitration

- Oct '03 Hearings/Dec '03 Order
- Issue #C3 – “Call Detail”
- New ICA Language - March '04
  - Defines Network Architecture
  - Assigns Responsibility to VZ to tag traffic correctly
  - **VZ default billing**



# Verizon Responsibility

- Verizon is the last stop before Cavalier
- Traffic misrouted/commingled
  - IXC Trunks
  - VZ and Other Trunks
- Billing information changed
  - From NPA/NXXX manipulated
  - From NPA/NXXX deleted



# Verizon “Fix” - MPB Tapes

- Inadequate – Short and incomplete
  - No Checks and Balances to 100%
- MPB Tapes are missing 20% of IXC and Transit calls
- MPB call detail is substantially different from the underlying Cavalier Switch data
  - Missing “From” Numbers
  - Incorrect CIC/OCN
- Matching with switch records not feasible



# Solution

- “Lanes and License Plates”
- Redefine Network Architecture
- CIC codes Identified
  - Georgia PSC Orders BS to supply
- Direct Interconnection Mandated
  - (VZ LD Declined to Interconnect with CavTel)



# Cavalier Telephone, LLC

## Exhibit Summary

Exhibit	Example	Description
1	A	Cavalier Switch Data where CIC is missing in signaling
	B	Cavalier Switch Data where From and Charge Numbers are missing in signaling
	C	Cavalier Switch Data where From Number is invalid data in signaling
2	A	IXC traffic delivered over End Office Trunks
	B	Local LEC traffic delivered over IXC Tandem Trunks
3		Analysis results reviewing Verizon SS7 and Verizon Meet Point
4	A	Results population of key fields in Verizon produced Meet Point
	B	Example of call with data manipulation on Verizon produced Meet Point
	C	Example of incorrect data derivation by Verizon that caused incorrect billing by Cavalier
	D	Example of local calls identified on Meet Point as IXC carried calls





# Cavalier Telephone, LLC

## Exhibit 1: Cavalier Switch Information Inadequacies

Data Sources: Cavalier Switch Data

Example A								
A_NUM	C_NUM	B_NUM	GAP	ORIG_DATE	DURATION	CIC	OLRN	OOCN
7873825942	-	8568519990	8566926790	7/31/2005 23:40:44	21.6	-	787382	4823

Issue:  
No CIC in Cavalier Switch data  
Call from Puerto Rico to New Jersey

Example B								
A_NUM	C_NUM	B_NUM	GAP	ORIG_DATE	DURATION	CIC	OLRN	OOCN
-	-	8044239990	8047941669	4/28/2005 0:26	31	-	-	-

Issue:  
No CIC in Cavalier Switch data  
Cavalier Switch data has both A\_NUM and C\_NUM missing

Example C								
A_NUM	C_NUM	B_NUM	GAP	ORIG_DATE	DURATION	CIC	OLRN	OOCN
3000000004	-	2677089990	2156461768	4/28/2005 10:09	423	-	-	-

Issue:  
No CIC in Cavalier Switch data  
Cavalier Switch data has invalid data for A\_NUM and C\_NUM is missing

Definitions	
Heading	Definition
A_NUM	CALLING NUMBER
B_NUM	CALLED NUMBER
C_NUM	CHARGED NUMBER
GAP	GENERIC ADDRESS PARAMETER - DIALED NUMBER
ORIG_DATE	ORIGINATION DATE AND TIME FOR CALL
DURATION	BILLABLE DURATION OF CALL IN SECONDS
CIC	CARRIER IDENTIFICATION NUMBER
OOCN	ORIGINATING OPERATING COMPANY NUMBER
OLRN	ORIGINATING LOCAL ROUTING NUMBER
OPC	ORIGINATING POINT CODE
CLI	CODE COMMON LANGUAGE LOCATION IDENTIFIER



# Cavalier Telephone, LLC

## Exhibit 2: Misrouted Traffic Examples by Verizon

Data Sources: Cavalier Switch Data and EMI Meet Point Files Delivered from Verizon

### Example A

Data Source	A_NUM	C_NUM	B_NUM	GAP	ORIG_DATE	DURATION	CIC	OLRN	OOCN	OPC	CLLI
Cavalier	7038230889	7038230889	8044229990	8047406349	7/31/05 23:49	12.9	-	703212	9213	246,195.25	RCMDVAGKDS0
Meet Point	7038230889		8047406349		7/31/05 23:48	12.9	6963	703823	9213		

### Issue:

IXC carried call delivered to Cavalier over End Office Trunking  
RCMDVAGKDS0 is 1301 GASKINS RD

### Example B

Data Source	A_NUM	C_NUM	B_NUM	GAP	ORIG_DATE	DURATION	CIC	OLRN	OOCN	OPC	CLLI
Cavalier	8047454884	-	8044229990	8043643588	8/1/05 14:41	0.02	-	804745	9213	246,195.40	RCMDVAIT76T
Cavalier	8045301379	-	8044275716	-	8/1/05 16:16	0.02	-	804530	9213	246,195.40	RCMDVAIT76T
Cavalier	8042259092	727	8044259990	8047687655	8/1/05 18:58	0.02	-	804225	9213	246,195.40	RCMDVAIT76T

### Issue:

Verizon Local call delivered to Cavalier over IXC Trunk Groups  
RCMDVAIT76T is at 2510 TURNER RD in Richmond - IXC Tandem

Definitions	Heading	Definition
A_NUM	CALLING NUMBER	
B_NUM	CALLED NUMBER	
C_NUM	CHARGED NUMBER	
GAP	GENERIC ADDRESS PARAMETER - DIALED NUMBER	
ORIG_DATE	ORIGINATION DATE AND TIME FOR CALL	
DURATION	BILLABLE DURATION OF CALL IN SECONDS	
CIC	CARRIER IDENTIFICATION NUMBER	
OOCN	ORIGINATING OPERATING COMPANY NUMBER	
OLRN	ORIGINATING LOCAL ROUTING NUMBER	
OPC	ORIGINATING POINT CODE	
CLLI	CODE COMMON LANGUAGE LOCATION IDENTIFIER	



# Cavalier Telephone, LLC

## Exhibit 3: Verizon SS7 Comparison to Verizon Meet Point

Data Sources: Verizon SS7 and Verizon Delivered Meet Point

April 28th Traffic Date

Verizon Rate Category	Total Billed Minutes	Non-Matched to Meet Point	Percentage of Meet Point NOT Delivered to Cavalier
<b>INTERLATA_ACCESS</b>	<b>1,185,303.66</b>	<b>103,311.32</b>	<b>9%</b>
INTRALATA_ACCESS	240,989.17	163,637.56	
<b>INTRALATA_TRANSIT</b>	<b>1,651,751.80</b>	<b>332,388.02</b>	<b>20%</b>
LOCAL	3,871,038.32	3,629,241.43	
MISSING	105,306.97	53,510.16	51%
NOCPN	259,841.97	98,552.78	38%
NULL	23.98	23.98	100%
Total of All Types	7,314,255.88	4,380,665.26	
Total Meet Point Related	3,202,228.39	587,786.27	18%

**Issue**  
 Verizon supplied SS7 when matched with EMI delivered to Cavalier  
 Specific volumes of Verizon SS7 not matched to delivered EMI  
 Categories of non-matched data are for calls that would never be carried by Verizon LEC  
 Shows estimation of non delivered EMI by Verizon



# Cavalier Telephone, LLC

## Exhibit 4: Call Data Inconsistencies Between Verizon Meetpoint and Cavalier Switch Data

Data Sources: Cavalier Switch Data and EMI Meet Point Files Delivered from Verizon

### Example A

Source	Call Jurisdiction Review from Verizon Meet Point	Minutes	Percentage
Verizon Meet Point	Cannot Determine Jurisdiction of Call, Missing From Number and Orig LRN	14,917,529	23.34%
Files Dated June 2005	Can Determine Jurisdiction of Call, Missing From Number but Have Orig LRN	20,183,424	31.58%
	Can Determine Jurisdiction of Call, Have Both To and From Number	28,812,143	45.08%
	Total	63,913,096	

### Issue

Over 50% of data provided by Verizon does not contain valid information to determine jurisdiction of a call

### Example B

Source	A_NUM	C_NUM	B_NUM	GAP	ORIG_DATE	DURATION	CIC	OLRN	OOCN
Cavalier	7032971228	-	2022459991	2022160668	8/1/05 14:58	9.0	-	703906	6232
Meet Point	0000000000		2022160668		8/1/05 14:57	9.0	0000	703906	6232

### Issue:

Call on Meet point does not have From Number populated

Cavalier Switch Data for same call shows value

Definitions	Definition
Heading	
A_NUM	CALLING NUMBER
B_NUM	CALLED NUMBER
C_NUM	CHARGED NUMBER
GAP	GENERIC ADDRESS PARAMETER - DIALED NUMBER
ORIG_DATE	ORIGINATION DATE AND TIME FOR CALL
DURATION	BILLABLE DURATION OF CALL IN SECONDS
CIC	CARRIER IDENTIFICATION NUMBER
OOCN	ORIGINATING OPERATING COMPANY NUMBER
OLRN	ORIGINATING LOCAL ROUTING NUMBER
OPC	ORIGINATING POINT CODE
CLLJ	CODE COMMON LANGUAGE LOCATION IDENTIFIER
BSA	BSA / FGA ACCESS NUMBER - EMI
OLRN	ORIGINATING LOCAL ROUTING NUMBER
OOCN	ORIGINATING OPERATING COMPANY NUMBER



Cavalier Telephone, LLC  
Exhibit 4b: Call Data Inconsistencies Between Verizon Meetpoint and Cavalier Switch Data  
Data Sources: Cavalier Switch Data and EMI Meet Point Files Delivered from Verizon

Example C Source	TYPE	DATE	A_NUM	B_NUM	DIR	CIC	BSA	OLRN	OOCN
Verizon Meet Point	110101	050322	00000000000	804314005	2	0000	80450611111	0000000000	4860
	110101	050322	00000000000	8044593225	2	0000	80450611111	0000000000	4860
	110101	050322	00000000000	8049651772	2	0000	80450611111	0000000000	4860
	110101	050322	00000000000	8047466015	2	0000	80450611111	0000000000	4860
	110101	050322	00000000000	8043462599	2	0000	80450611111	0000000000	4860

Issue  
Calls have no From Number, No OLRN  
BSA Field is invalidly populated with Teleco LRN  
Verizon admitted error in derivation stating traffic belongs to Omnipoint

Example D Source	Call Type	Date	ANUM	BNUM	DIR	CIC	BRAO	BSA OLRN	OOCN
Verizon Meet Point	110120	050817	8042268189	8043558757	2	5158	A78	0 8042260000	9213
	110120	050816	8042386799	8047265788	2	948	A78	0 8042380000	9213
	110120	050817	8045563359	8047987242	2	223	A78	0 8042380000	9213
	110120	050817	8048191954	8047436493	2	5230	A78	0 8046490000	9213
	110120	050817	8042900103	8047842200	2	5119	A78	0 8047470000	9213

110120	050817	8043799815	8045261111	2	432	A78	0 8048970000	9213
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Issues  
From Number owned by Verizon  
Call is local in jurisdiction  
EMI shows IXC carrier delivering the call to Verizon to terminate to Cavalier  
Without EMI, would have billed this call to Verizon LEC since CIC is not passed

Definitions	Definition
Heading	
A_NUM	CALLING NUMBER
B_NUM	CALLED NUMBER
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GAP	GENERIC ADDRESS PARAMETER - DIALED NUMBER
ORIG_DATE	ORIGINATION DATE AND TIME FOR CALL
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OPC	ORIGINATING POINT CODE
CLLI	CODE COMMON LANGUAGE LOCATION IDENTIFIER
BSA	BSA / FGA ACCESS NUMBER - EMI
OLRN	ORIGINATING LOCAL ROUTING NUMBER
OOCN	ORIGINATING OPERATING COMPANY NUMBER

